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July 20, 2000

U.S. Department of Transportation Dockets  
Docket No. FAA-2000-7623 - 28  
400 Seventh Street, SW Room Plaza 401  
Washington, DC 20590

DEPT. OF TRANSPORTATION

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Dear Sir or Madam:

I am a current, instrument rated private pilot with Class III medical and about 935 hours total time. I have flown and owned a variety of single engine land airplanes, both complex and high performance, for over 22 years. I currently own and fly a 1965 Mooney M20C. I do not hold an A&P license. I believe the following three areas of the Federal Aviation Regulations need to be changed:

1. Pilot/Operator-Performed Aircraft Maintenance. Current regulations unnecessarily restrict the maintenance and repair actions that can be taken by non-A&P rated pilots, owners and operators of general aviation aircraft. This materially increases the cost of ownership and operation of private aircraft, by requiring an A&P to perform some repairs that could easily and safely be done by a reasonably mechanically inclined owner. In many cases, the owner would likely do higher quality work because his own safety depends on it. As the general aviation fleet ages, the need for restoration and maintenance will continue to increase, while the supply of A&P rated technicians is declining. To ensure continued growth of general aviation, the regulations need to permit interested and willing pilot/owners to perform more repair and restoration tasks themselves, without requiring supervision of an A&P or logbook signoff by an IA. For example, in addition to actions currently permitted such as putting air in the tires, filling the battery and changing light bulbs, within certain limits as noted, pilot/owners should be able to:

- remove, repair and/or replace avionics (except transponders), wiring, and electrical accessories that do not drive or control primary flight control systems;
- remove, repair and/or replace flight and engine monitoring instrumentation so long as the integrity of the pitot static system is not disturbed;
- remove, repair and/or replace interior panels, insulation, side windows, seats, upholstery, and carpeting;
- remove, repair and/or replace/install ancillary engine compartment components such as cooling baffles and seals, scat tubing, exhaust component positioning springs and brackets, oil drain tubes, cowl camlocks/screws/fasteners, etc..

Perhaps the best way to rewrite the regs is to turn them around. Rather than listing those specific actions non-A&P rated pilot/owners can do without supervision of an A&P, the regs should specifically identify those requiring an A&P or his supervision, *leaving all else to the owner*. In this regard, I would think it prudent to retain the following within the A&P's domain, (or performed by pilot/owners under A&P supervision as is currently required):

- primary flight control systems and instrumentation
- pitot static systems
- transponder and encoding altimeter maintenance and calibration
- prop maintenance of any type

- windshield repair/replacement
- anything materially effecting weight and balance or POH performance capability

Further, I believe it would be reasonable to limit additional permitted pilot/owner maintenance to aircraft not operated for compensation or hire; to require all such maintenance to be logged in the aircraft logbooks with full descriptions of work performed, by whom, and the date; and to retain an annual inspection and IA signoff requirement. Before an aircraft could be used for compensation or hire, an immediate, traditional "100 hour/annual" inspection with IA signoff would be required. However, if not operated for compensation or hire, having had pilot/owner maintenance performed and properly logged would not, in and of itself, constitute grounds for failing the next required annual inspection. In other words, pilot/owner maintenance would be permitted, but would have to be performed and documented to a quality standard sufficient to pass the traditional annual inspection criteria.

2. Instrument Training and Currency Requirements. In my opinion, the initial training requirements for an instrument rating should include at least three hours of dual instruction by a CFII in *actual* IMC. They should also include preparation for and conduct of a cross country flight encompassing takeoff, cruise to a destination over 50 nautical miles from the point of departure, and execution of a precision or nonprecision approach and a full stop landing, *all in actual IMC*. If such training is conducted only during daylight hours, the newly rated instrument pilot would be restricted to day IFR only. If these actual IMC training requirements were completed entirely at night, (or additionally achieved subsequent to issuance of the rating), then the night IFR restriction would be removed. Unlike the current requirements that allow a person to obtain an instrument rating with no actual IMC experience whatsoever, these more stringent requirements would enhance safety by improving pilot confidence and skill.

While it may be impractical to insist that instrument currency requirements include frequent flight in actual IMC or at night, it is not unreasonable to require ongoing practice and periodic refamiliarization with the varied skills needed to successfully manage these special flight conditions. I would propose an additional currency requirement that would require at least one hour of flight in actual IMC within the preceding twelve months (for day IFR privileges), and at least one hour of hood time or actual IMC flight time at night (for night IFR privileges). Should these proposals meet objections from a majority of commentators, a reasonable compromise may be to establish these as requirements *to carry passengers* in IMC or under IFR at night.

3. Third Class Medical Certification. As noted previously, I have been a pilot for 22 years. Throughout this time I have continuously kept abreast of popular aviation literature. Nowhere and at no time during this period have I seen reports of any credible evidence that medical certification of private pilots improves aviation safety, or that lack thereof would jeopardize it in any statistically measurable way. Further, pilots are, by and large, a self-disciplining lot. With rare exceptions who will end up as statistics whether they have bi-annual medical screenings or not, pilots inherently know when they are physically up to the task of flying and when they're not. The regs already require pilots to ground themselves when a medical condition makes them unfit to act as PIC. That is clearly sufficient. Finally, the entire FAA regulatory structure relies mostly on voluntary self-compliance, as the FAA

has scant resources to undertake any compliance programs of significance. In short, the third class medical certification process for private pilots serves no worthwhile purpose and is wholly unnecessary. Beyond an initial screening when a person begins flight training, this costly, often perfunctory, and purely bureaucratic requirement should be eliminated altogether.

Thank you for this opportunity to suggest changes to the FAA regulations. In my opinion, the changes noted above are those that are both urgent and most potentially beneficial to the safety and the long-term health of general aviation in the U.S.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Bodem". The signature is fluid and cursive, with a large initial "R" and "B".

Richard A. Bodem  
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Overland Park, KS 66221